

Before the
UNITED STATES COPYRIGHT ROYALTY JUDGES
The Library of Congress



In the Matter of:

**DETERMINATION OF RATES AND
TERMS FOR MAKING AND
DISTRIBUTING PHONORECORDS
(PHONORECORDS III)**

Docket No. 16-CRB-0003-PR (2018-2022)

**AMAZON DIGITAL SERVICES LLC'S MOTION TO FILE
CORRECTED VERSIONS OF ITS WRITTEN DIRECT STATEMENT**

On November 1, 2016, Amazon Digital Services LLC ("Amazon") filed the RESTRICTED version of its Written Direct Statement in the above-captioned matter. On November 3, 2016, Amazon filed the PUBLIC version of its Written Direct Statement. In the interest of accuracy, clarity, and consistency, Amazon now seeks leave to make certain non-substantive corrections to both the RESTRICTED and PUBLIC versions of its Written Direct Statement.

First, Amazon would update a single citation in the Written Direct Testimony of Rishi Mirchandani and a handful of citations in the Expert Report of Dr. Glenn Hubbard to replace references to file names with the corresponding Bates numbers of the documents as produced by Amazon. These changes will ensure the consistency of citations throughout Amazon's submissions and enable readers to more easily match the citations in Mr. Mirchandani's testimony and Dr. Hubbard's report to the data files produced by Amazon in this proceeding.

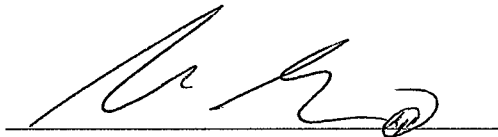
Second, Amazon would replace Appendix C to Dr. Hubbard's report with a corrected version of Appendix C. The version of Appendix C included in the RESTRICTED version of

Amazon's Written Direct Statement was a draft version which does not contain a complete list of documents relied upon by Dr. Hubbard in his report. The version of Appendix C included in the PUBLIC version of Amazon's Written Direct Statement did contain a complete list of documents relied upon by Dr. Hubbard in his report, but did not include complete citations to all of those documents. This change will ensure that readers of both the RESTRICTED and PUBLIC versions of Amazon's Written Direct Statement will see the same Appendix C, reflecting the complete list of documents relied upon with complete citations thereto.

Enclosed with this motion are updated RESTRICTED and PUBLIC versions of Amazon's Written Direct Statement containing the corrections described above.

Dated: November 16, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael S. Elkin', is written over a horizontal line.

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